



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

**VIA ELECTRONIC MAIL**

Sean Stadler, Operations Manager  
Chemtool Inc.  
A Subsidiary of Lubrizol, a Berkshire Hathaway Company  
1165 Prairie Hill Rd.  
Rockton, Illinois 61072  
Sean.stadler@Chemtool.com

Re: Request for Information Regarding EPCRA Sections 304, 311 and 312, and  
CERCLA Section 103(a) for the Chemtool Inc. Facility in Rockton, Illinois

Dear Mr. Stadler:

The U.S. Environmental Protection Agency is currently investigating the compliance by Chemtool Inc. (Chemtool or you) with Sections 304, 311 and 312 of the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA), 42 U.S.C. §§ 11004, 11021 and 11022, and Section 103(a) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9603. This investigation includes but is not limited to the release of hazardous substances on June 14, 2020, at the Chemtool Facility at 1165 Prairie Hill Rd. in Rockton, Illinois.

You are hereby requested to respond to the enclosed Information Request within **30 days** of receipt of this letter. Please be advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal fines or up to five years of imprisonment or both under 18 U.S.C. § 1001. If you are unable to respond in a timely fashion because of impacts related to the COVID-19 pandemic, please submit a written extension request via email to Ginger Jager at [jager.ginger@epa.gov](mailto:jager.ginger@epa.gov) explaining the specific impacts on your ability to respond.

EPA has the authority to use the information requested herein in an administrative, civil, or criminal action. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1995, 44 U.S.C. § 3501, *et seq.*

Any response should be electronically submitted to EPA, to the extent possible and sent to Ginger Jager at [jager.ginger@epa.gov](mailto:jager.ginger@epa.gov). The subject line of all email correspondence must include Chemtool Inc., Rockton, Illinois. All electronically-submitted materials must be in final and searchable format, such as Portable Document Format (PDF) with Optical Character Recognition

(OCR) applied. If your response is too large to be submitted over email, please inform Ms. Jager of that issue and we will send you a secure link to a website that will allow you (and you alone) to upload your response. If electronic submittal is not possible, the submissions must be sent to the following address:

Ginger Jager  
Chemical Emergency Preparedness  
and Prevention Section (SE-5J)  
U.S. Environmental Protection Agency  
77 West Jackson Boulevard  
Chicago, Illinois 60604

Please direct any questions you may have regarding this Information Request to Ginger Jager at (312) 886-0767 or [jager.ginger@epa.gov](mailto:jager.ginger@epa.gov) and any legal questions you have to John Matson at (312) 886-2243 or Naeja Dixit at (312) 353-5524.

EPA strongly encourages Chemtool to give this matter its immediate attention and to respond to this Information Request within the time specified above.

Thank you for your cooperation in this matter.

Sincerely,

Michael E. Hans, Chief  
Chemical Emergency Preparedness  
and Prevention Section

Enclosures (3):

1. Information Request Definitions
2. Information Request Instructions
3. Information Request

CC: David L. Rieser  
Counsel for Lubrizol  
[david.rieser@klgates.com](mailto:david.rieser@klgates.com)

## **DEFINITIONS**

For the Instructions and the Information Request set forth herein, the following definitions shall apply:

1. The terms "you" or "Respondent" shall mean the organization or entity identified in the cover letter, and its officers, managers, employees, contractors, trustees, and agents.
2. The term "person" as used herein, in the plural as well as the singular, shall mean any natural person, firm, contractor, corporation, partnership, trust or governmental entity, unless the context indicates otherwise.
3. The terms "and" as well as "or" shall be construed either conjunctively or disjunctively as necessary to bring within the scope of this Information Request all information which might otherwise be construed to be outside their scope.
4. The terms "furnish," "describe," or "indicate" shall mean turning over to the EPA either original or duplicate copies of the requested information in the possession, custody, or control of the Respondent. Where specific information has not been memorialized in any document but is nonetheless responsive to a request, you must respond to the request with a written response. If such requested information is not in your possession, custody, or control then indicate where such information or documents may be obtained.
5. The term "release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles) of any hazardous chemical, extremely hazardous chemical, toxic chemical, or hazardous substance.
6. The term "hazardous substance" shall have the same definition as that contained in Section 101(14) of CERCLA, 42 U.S.C. § 9601(11), including mixtures of hazardous substances with other substances, including petroleum products.
7. The term "hazardous chemical" shall have the same definition as that contained in 29 C.F.R. § 1910.1200(c), *see also* 40 C.F.R. § 355.61, except that such term does not include the following:
  - a) Any food, food additive, color additive, drug, or cosmetic regulated by the Food and Drug Administration.
  - b) Any chemical present as a solid in any manufactured item to the extent exposure to the substance does not occur under normal conditions of use.
  - c) Any chemical to the extent it is used for personal, family, or household purposes,

or is present in the same form and concentration as a product packaged for distribution and use by the general public.

- d) Any chemical to the extent it is used in a research laboratory or a hospital or other medical facility under the direct supervision of a technically qualified individual.
  - e) Any chemical to the extent it is used in routine agricultural operations or is a fertilizer held for sale by a retailer to the ultimate customer.
8. The term "extremely hazardous substance" means a chemical on the list contained in Section 302(a)(2) of EPCRA, 42 U.S.C. § 11002(a)(2). *See also* 40 C.F.R. Part 355, Appendices A and B.
  9. The term "toxic chemical" means a chemical on the list described in Section 313(c) of EPCRA, 42 U.S.C. § 11113(c). *See also* <https://www.epa.gov/toxics-release-inventory-tri-program/tri-listed-chemicals>.
  10. The term "environment" includes water, air, and land and the interrelationships which exist among and between water, air, and land and all living things.
  11. The terms "transport" or "transportation" mean the movement of a hazardous chemical by any mode, including pipeline, and in the case of a hazardous chemical which has been accepted for transportation by a common or contract carrier, the terms "transport" or "transportation" shall include any stoppage in transit which is temporary, incidental to the transportation movement, and at the ordinary operating convenience of a common or contract carrier, and any such stoppage shall be considered as a continuity of movement and not as the storage of a hazardous chemical.
  12. The term "Facility" means all buildings, equipment, structures, and other stationary items which are located at 1165 Prairie Hill Rd., Rockton, Illinois. which are owned or operated by Chemtool (or by a person who controls, is controlled by, or is under common control with Chemtool).
  13. The term "material safety data sheet" (MSDS) means the sheet required to be developed under 29 C.F.R. § 1910.1200(g).
  - 14.
  15. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, 42 U.S.C. §§ 9601-9675, the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §§ 6901-6991, 40 C.F.R. Part 300 or 40 C.F.R. Parts 260-280, in which case the statutory or regulatory definitions shall apply.

## **INSTRUCTIONS**

1. A separate response must be made to each of the questions set forth in this Information Request.
2. Precede each answer with the number in the Information Request to which it corresponds.
3. In answering each request, identify all contributing sources of information.
4. If information not known or not available to the Respondent as of the date of submission of its response should later become known or available, Respondent must supplement its response to EPA. Moreover, should the Respondent find, at any time after the submission of its response that any portion of the submitted information is false or misrepresents the truth, Respondent must notify EPA as soon as possible.
5. You must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete.

6. The information requested herein must be provided notwithstanding its possible characterization as confidential information or trade secrets. You may, if you desire, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. You should read carefully the above-cited regulations before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

## **INFORMATION REQUESTS**

1. Identify all persons consulted in the preparation of the answers to this request.
2. Identify all documentation consulted, examined, or referred to, in the preparation of the answers to this request and provide copies of all such documents.
3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question, or who may be able to provide additional responsive documents, identify such persons.
4. What is Chemtool Inc.'s (Chemtool) Standard Industrial Classification (SIC) Code?
5. What is Chemtool's North American SIC Code?
6. What is Chemtool's Dun & Bradstreet number?
7. What were Chemtool's annual sales for its most recently completed fiscal year?
8. How many employees does Chemtool employ at the Facility?
9. How many employees are employed at Chemtool corporate wide?
10. Is Chemtool a RCRA facility? If so, provide the EPA Identification Number.
11. Provide a copy of your emergency plan, which outlines the procedures for notification of accidental releases at the Facility.
12. Provide documentation regarding the training of your employees on the procedures for notification of accidental releases at the Facility.
13. Provide the name and current address of the owner(s) of the property located at 1165 Prairie Hill Road, Rockton, IL 61072, during the time period of January 1, 2021, to the present.
14. Provide the name and current address of the operator(s) of the Facility during the time period of January 1, 2021, to the present.
15. Provide the name of the state where Chemtool was Incorporated.
16. If Chemtool was a subsidiary of a corporation during the time period of January 1, 2021, to the present, identify the parent corporation and its state of incorporation.

17. If Chemtool was a division of a corporation during the time period of January 1, 2021, to the present, identify the corporation.
18. Identify each hazardous substance released during, or as a result of, the fire that occurred on or around June 14, 2021, and its Chemical Abstract Service (CAS) number.
19. Provide the following information for each release of a hazardous substance listed in response to Request Number 18:
  - a. Describe in detail the process or event that produced or resulted in each release of the hazardous substance;
  - b. Describe in detail the chain of events that produced or resulted in the release of the hazardous substance;
  - c. State how much of the hazardous substance was released during or after the fire that occurred on or around June 14, 2021? Describe your method or source of information in calculating the quantity released and provide the calculations; and
  - d. Describe the surfaces on or to which the hazardous substance was released and how much was released to each surface. Describe your method or source of information in calculating the quantity and provide the calculations.
20. Provide the following information for each hazardous substance listed in response to Request Number 18:
  - a. How much of the hazardous substance was released, emitted, or migrated onto and/or into the soil and/or the subsurface strata? Describe your method or source of information in calculating the quantity and provide the calculations;
  - b. How much of the hazardous substance volatilized? Describe your method or source of information in calculating the quantity and provide the calculations;
  - c. How much of the hazardous substance was discharged into the sanitary sewer system? Describe any pre-treatment conducted by your facility, if applicable. Describe your method or source of information in calculating the quantity and provide the calculations;
  - d. How much of the hazardous substance was discharged into the storm sewer system? Describe your method or source of information in calculating the quantity and provide the calculations; and
  - e. How much of the hazardous substance was discharged into the Rock River or other water body? Describe your method or source of information in calculating the quantity and provide the calculations.
21. Did any of the hazardous substance(s) released on or around June 14, 2021, react post-release with any substance to cause a by-product? If so, explain and provide the calculations to show the reaction and quantity of each by-product released.
22. What was the pre-release concentration of each hazardous substance that was released on or around June 14, 2021? Describe your method or source of information in determining the concentration.

23. Provide copies of any and all relevant descriptions of each released hazardous substance listed in response to Request Number 18 (*i.e.*, MSDS, Manifest, Analytical Data, etc.).
24. Provide the RCRA hazardous waste identification number for each released hazardous substance listed in response to Request Number 18.
25. Provide the results of any and all analyses concerning all releases listed in response to Request Number 18, including but not limited to results of any sampling that was conducted regarding each release.
26. Describe in detail the actions taken by your employees and/or anyone else regarding the emergency response to each release listed in response to Request Number 18, including any and all chemicals used, the handling or clean-up of the substance, including transportation and destination.
27. Was each release listed in response to Request Number 18 contained solely within a building or structure? If so, explain.
28. Did any of the substance(s) released which you listed in response to Request Number 18 migrate beyond your Facility's boundaries? If so, explain.
29. Provide copies of any permits that cover any release listed in response to Request Number 18, and provide an explanation of why you believe each release is covered by this permit.
30. If any release listed in response to Request Number 18 was to a containment area, please respond to the following information requests:
  - a. What are the materials of construction for the containment area?
  - b. What are the dimensions of the containment area?
  - c. Did the containment area contain a neutralization agent? If so, what, and how much of the neutralization agent was present?
31. Provide a diagram of the Facility in relation to each of the property boundaries, north, east, south, west, and identify the distance between the point of the release and each property boundary.
32. Provide a description of the area surrounding the Facility, including residential, commercial, and industrial nature of the area and the approximate distance of the closest neighbor to the Facility in each direction.
33. If a release listed in response to Request Number 18 was from a storage area (*i.e.*, tanker, storage tank, etc.), provide the following information:



- a. The location of the tank or storage area, inside or outside of a building, ground level, one story up, etc.;
  - b. The location of the release in relation to the tank or storage area (*i.e.*, top left side, center top, center side, etc.);
  - c. The size of the hole from which the leak occurred;
  - d. The length of tank or storage area;
  - e. A diagram of the storage area; and
  - f. The diameter of tank or storage area.
34. To the best of your knowledge what was the duration of each release listed in response to Request Number 18 from onset to mitigation? Explain how you determined the onset and mitigation of the release and what documents or information you relied on to make your determination.
  35. Provide the weather conditions at the time of each release listed in response to Request Number 18, including the temperature, humidity, wind speed and direction, precipitation, sunny/cloudy, and barometric conditions.
  36. Was any release listed in response to Request Number 18 from a pressurized system? If so, explain and provide the amount of pressure in pounds per square inch gauge (psig).
  37. If all the hazardous substances in any Facility system were not released on or around June 14, 2021, how much of each hazardous substance was in the system at the time of each release listed in response to Request Number 18, and how much of each hazardous substance was left in the system after mitigation of each release?
  38. Were any releases listed in response to Request Number 18 from a process pipe, a pipe connected to a tank, or a tank? If none of these apply, explain exactly where each release occurred.
  39. If a release listed in response to Request Number 18 was from a process pipe or a pipe connected to a tank, provide the dimensions of the piping.
  40. As a result of the releases listed in response to Request Number 18, were there any evacuations, persons medically treated, hospitalizations, and/or deaths associated with any of the releases? If so, describe in detail.
  41. Was there any known environmental damage (*i.e.*, fish kills, vegetation damage, etc.) from any of the releases listed in response to Request Number 18? If so, describe in detail.
  42. Provide both the date and time when Chemtool first realized that a hazardous substance was released from the Facility on or around June 14, 2021.

43. Provide both the date and time when Chemtool had knowledge that a reportable quantity (RQ) of a hazardous substance(s) was released from the Facility on or around June 14, 2021.
44. If the time of Chemtool's knowledge of the release listed in response to Request Number 41, and the time of Chemtool's knowledge of an RQ released listed in response to Request Number 42 is not the same, explain what actions Chemtool employees took in determining that an RQ was released.
44. Did Chemtool notify the National Response Center regarding the release on or around June 14, 2021? If so, provide the name of the individual that provided the notification, the agency notified, and the date and time of each call.
46. Did Chemtool notify the Illinois State Emergency Response Commission regarding the release on June 14, 2021? If so, provide the name of the individual that provided the notification, the agency notified, and the date and time of each call.
47. Did Chemtool notify the Winnebago Local Emergency Planning Committee regarding the release on June 14, 2021? If so, provide the name of the individual that provided the notification, the agency notified, and the date and time of each call.
48. Did Chemtool provide a written follow-up emergency notice regarding the release on June 14, 2021, to the Illinois State Emergency Response Commission, as required by Section 304(c) of EPCRA? If so, provide documentation to support your claim.
49. Did Chemtool provide a written follow-up emergency notice regarding the release on June 14, 2021, to the Winnebago Local Emergency Planning Committee, as required by Section 304(c) of EPCRA? If so, provide documentation to support your claim.
50. Did Chemtool submit to EPA a Risk Management Plan (RMP) for the Facility pursuant to 40 C.F.R. Part 68? If so, provide the date when the RMP was submitted and the assigned RMP Identification Number.
51. What is the maximum amount of RMP reportable substances that Chemtool uses, handles, produces, or stores on site at the Facility at any given time? (A list of RMP reportable substances and their threshold amounts is attached).
52. Describe in detail each process at the Facility which involves any RMP reportable substance. For the purposes of this information request, a "process" is any activity involving any RMP reportable substances including any use, storage, manufacturing, handling, or on-site movement of such substances, or combination of these activities. For the purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process. *See* 40 C.F.R. § 68.3. Include in your answer

the design capacity of each process. If your process is a single storage tank, or a group of co-located storage tanks, or other containers, please provide the capacity of each tank, or container.

53. Describe Chemtool's method or source of information it used to calculate the quantity of any RMP reportable substance at the Facility in its answer to Request Number 51. Include a current Safety Data Sheet with your response. Include a Certificate of Analysis from the manufacturer or lab testing information for the concentration of each substances used.
54. When did Chemtool first start performing the process(es) at the Facility described in Request Number 53?
55. When did Chemtool start using RMP reportable substances at the Facility in amounts greater than threshold amounts?

#### **EPCRA Requests for 2017**

56. Was Chemtool conducting business at 1165 Prairie Hill Road, Rockton, IL 61072, during the time period of January 1, 2017, to December 31, 2017? If so, please respond to the following information requests:
  - a. Did Chemtool use, produce, manufacture, and/or store any hazardous chemicals at this location during the period of January 1, 2017, to December 31, 2017?
  - b. If Chemtool used, produced, manufactured, and/or stored any hazardous chemicals at this location during the time period set forth in Request Number 56(a), provide a list of such hazardous chemicals and the maximum quantity stored at this facility at any one given time during the period of January 1, 2017, to December 31, 2017.
  - c. For each hazardous chemical listed in response to Request Number 56(b), provide the applicable MSDS.
  - d. Provide a copy of the Tier One or Tier Two form for the Facility, required under Section 312 of EPCRA, 42 U.S.C. § 11022, for the period of January 1, 2017, to December 31, 2017.
  - e. Did Chemtool supply copies of all MSDSs, or a list of hazardous chemicals, for materials stored at the Facility above a Threshold Planning Quantity (TPQ) and/or Minimum Threshold Quantity to the Illinois State Emergency Response Commission on or before October 17, 1987, or 90 days from the date the hazardous chemical became present at this facility? If so, provide documentation to support your claim.
  - f. Did Chemtool supply a copy of each and every Tier One or Tier Two form provided under subquestion (d) above to the Illinois State Emergency Response Commission for

the period of January 1, 2017, to December 31, 2017, on or before March 1, 2018? If so, provide documentation to support your claim.

- g. Did Chemtool supply copies of all MSDSs, or a list of hazardous chemicals, for materials stored at this facility above a TPQ and/or Minimum Threshold Quantity to the Winnebago County Local Emergency Planning Committee on or before October 17, 1987, or 90 days from the date the hazardous chemicals became present at this facility? If so, provide documentation to support your claim.
- h. Did Chemtool supply a copy of each and every Tier One or Tier Two form provided under subquestion (d) above to the Winnebago County Local Emergency Planning Committee for the period of January 1, 2017, to December 2017, on or before March 1, 2018? If so, provide documentation to support your claim.
- i. Did Chemtool supply copies of all MSDSs, or a list of hazardous chemicals, for materials stored at this facility above a TPQ and/or Minimum Threshold Quantity to the Rockton Fire Department on or before October 17, 1987, or 90 days from the date the hazardous chemical became present at this facility? If so, provide documentation to support your claim.
- j. Did Chemtool supply a copy of each and every Tier One or Tier Two form responsive to Request 55(d) above to the Rockton Fire Department for the period of January 1, 2017, to December 31, 2017, on or before March 1, 2018? If so, provide documentation to support your claim.

#### **Requests for 2018-2020**

57. Was Chemtool conducting business at 1165 Prairie Hill Road, Rockton, IL 61072, during the time period of January 1, 2018, to December 31, 2018? If so, please respond to the following information requests:
- a. Did Chemtool use, produce, manufacture, and/or store any hazardous chemicals at this location during the period of January 1, 2018, to December 31, 2018?
  - b. If Chemtool used, produced, manufactured, and/or stored any hazardous chemicals at this location during the time period set forth in Request Number 57(a), provide a list of such hazardous chemicals and the maximum quantity stored at the Facility at any one given time during the period of January 1, 2018, to December 31, 2018.
  - c. For each hazardous chemical listed in response to Request Number 57(b), provide an applicable MSDS. If you already provided an MSDS for a hazardous chemical in information request number 56, you need not provide another one for the same hazardous chemical.

- d. Provide a copy of the Tier One or Tier Two form for the Facility required under Section 312 of EPCRA, 42 U.S.C. § 11022, for the period of January 1, 2018, to December 31, 2018.
  - e. Did Chemtool supply a copy of every Tier One or Tier Two form provided under subquestion (d) above to the Illinois State Emergency Response Commission for the period of January 1, 2018, to December 31, 2018, on or before March 1, 2019? If so, provide documentation to support your claim.
  - f. Did Chemtool supply a copy of every Tier One or Tier Two form provided under subquestion (d) above to the Winnebago County Local Emergency Planning Committee for the period of January 1, 2018, to December 31, 2018, on or before March 1, 2019? If so, provide documentation to support your claim.
  - g. Did Chemtool supply a copy of every Tier One or Tier Two form provided under subquestion (d) above to the Rockton Fire Department for the period of January 1, 2018, to December 31, 2018, on or before March 1, 2019? If so, provide documentation to support your claim.
58. Was Chemtool conducting business at 1165 Prairie Hill Road, Rockton, IL 61072, during the time period of January 1, 2019, to December 31, 2019? If so, please respond to the following information requests:
- a. Did Chemtool use, produce, manufacture, and/or store any hazardous chemicals at this location during the period of January 1, 2019, to December 31, 2019?
  - b. If Chemtool used, produced, manufactured, and/or stored any hazardous chemicals at this location during the time period set forth in Request Number 58(a), provide a list of such hazardous chemicals and the maximum quantity stored at the Facility at any one given time during the period of January 1, 2019, to December 31, 2019.
  - c. For each hazardous chemical listed in response to Request Number 58(b), provide an MSDS. If you already provided an MSDS for a hazardous chemical in Request Number 56 or 57, you need not provide another one for the same hazardous chemical.
  - d. Provide a copy of the Tier One or Tier Two form for the Facility required under Section 312 of EPCRA, 42 U.S.C. § 11022, for the period of January 1, 2019, to December 31, 2019.
  - e. Did Chemtool supply a copy of every Tier One or Tier Two form provided under subquestion (d) above to the Illinois State Emergency Response Commission for the period of January 1, 2019, to December 31, 2019, on or before March 1, 2020? If so, provide documentation to support your claim.

- f. Did Chemtool supply a copy of every Tier One or Tier Two form provided under subquestion (d) above to the Winnebago County Local Emergency Planning Committee for the period of January 1, 2019, to December 31, 2019, on or before March 1, 2020? If so, provide documentation to support your claim.
  - g. Did Chemtool supply a copy of every Tier One or Tier Two form provided under subquestion (d) above to the Rockton Fire Department for the period of January 1, 2019, to December 31, 2019, on or before March 1, 2020? If so, provide documentation to support your claim.
59. Was Chemtool conducting business at 1165 Prairie Hill Road, Rockton, IL 61072, during the time period of January 1, 2020, to December 31, 2020? If so, please respond to the following information requests:
- a. Did Chemtool use, produce, manufacture, and/or store any hazardous chemicals at this location during the period of January 1, 2020, to December 31, 2020?
  - b. If Chemtool used, produced, manufactured, and/or stored any hazardous chemicals at this location during the time period set forth in Request Number 59(a), provide a list of such hazardous chemicals and the maximum quantity stored at the Facility at any one given time during the period of January 1, 2020, to December 31, 2020.
  - c. For each hazardous chemical listed in response to Request Number 59(b), provide an MSDS. If you already provided an MSDS for a hazardous chemical in Request Number 56, 57 or 58, you need not provide another one for the same hazardous chemical.
  - d. Provide a copy of the Tier One or Tier Two form for the Facility required under Section 312 of EPCRA, 42 U.S.C. § 11022, for the period of January 1, 2020, to December 31, 2020.
  - e. Did Chemtool supply a copy of every Tier One or Tier Two form provided under subquestion (d) above to the Illinois State Emergency Response Commission for the period of January 1, 2020, to December 31, 2020, on or before March 1, 2021? If so, provide documentation to support your claim.
  - f. Did Chemtool supply a copy of every Tier One or Tier Two form provided under subquestion (d) above to the Winnebago County Local Emergency Planning Committee for the period of January 1, 2020, to December 31, 2020, on or before March 1, 2021? If so, provide documentation to support your claim.
  - g. Did Chemtool supply a copy of every Tier One or Tier Two form provided under subquestion (d) above to the Rockton Fire Department for the period of January 1, 2020, to December 31, 2020, on or before March 1, 2021? If so, provide documentation to support your claim.

